

BEYS LISTON MOBARGHA & BERLAND LLP
Michael P. Beys

August 11, 2016

VIA ECF & FACSIMILE (212-805-4060)

The Honorable Henry Pitman
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *United States v. Kaleil Isaza Tuzman*, No. S1 15 Cr. 536 (PGG)

Dear Judge Pitman:

We are counsel to defendant Kaleil Isaza Tuzman, who has been released on bail pursuant to bail orders signed by Magistrate Judge Frank Maas on July 15, 2016 (ECF 69) and modified on July 18, 2016 (ECF 77). He is currently on home detention, with travel restricted to the Southern District of New York. We respectfully submit this letter to seek permission for Mr. Isaza Tuzman to travel to Western Massachusetts on August 12, 2016, to spend the weekend with his family. The government and Pretrial Services have no objection to this request.

Specifically, Mr. Isaza Tuzman requests permission to travel to Massachusetts by car on the morning of Friday, August 12 and return by car on the evening of Tuesday, August 16, 2016. He would be traveling between family residences in Amherst, Hatfield, Holyoke and environs, and would stay in the home of a family member, or at a local hotel. He will provide the exact address where he will stay to his Pretrial Services Officer.

Mr. Isaza Tuzman intends to attend religious services on the evening of August 12th in Amherst and again on the morning and early afternoon of August 13th in Amherst or Northampton (which he is otherwise permitted to attend and has been attending during his home detention). He plans to spend time with his sister Intiya Isaza-Figueroa, his father, Luis Orlando Isaza, and his step-mother, Milagro Isaza-Figueroa, all of whom are co-signers on his bond. He also hopes to spend time with his mother, Ani Tuzman, his sister, Surya Isaza-Figueroa and his younger brother, Emmanuel Tuzman-Eagan. Emmanuel suffers from a physical affliction and has special needs. Mr. Isaza Tuzman is an important source of emotional and psychological support for him. Finally, Mr. Isaza Tuzman hopes to celebrate the birthday of his nephew Anaías on Sunday, August 14th.

The Court should note that under the original, unmodified bail order – before he made arrangements to reside in Manhattan during his home detention – Mr. Isaza Tuzman was supposed “to reside with [his] father in Holyoke MA,” with travel restricted to the District of

Page 2 of 2

Massachusetts (ECF 69); and the current, modified bail order contemplates that he will travel periodically to Massachusetts, subject to court approval (ECF 77).

This is the second request to temporarily modify Mr. Isaza Tuzman's travel restrictions. Last week, Mr. Isaza Tuzman received permission to travel to Wayne, Pennsylvania, in the Eastern District of Pennsylvania, to attend a friend's funeral on August 5th.

I have spoken with Pretrial Services Officer John Moscato, who is supervising Mr. Isaza Tuzman while on pretrial release, and he has no objection to this request. I have also communicated with Assistant U.S. Attorney Damian Williams, and the government also has no objection.

We thank the Court in advance for its consideration.

Respectfully Submitted,

/s/ Michael P. Beys

Michael P. Beys, Esq.
Counsel for Kaleil Isaza Tuzman

cc. Hon. Paul G. Gardephe, U.S.D.J. (via ECF)
All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via email)